



GEORGIA M. PESTANA  
*Corporation Counsel*

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

NICHOLAS SCHAEFER  
*Assistant Corporation Counsel*  
Labor & Employment Law Division  
(212) 356-3187  
nschaefer@law.nyc.gov

January 21, 2022

**BY ECF**

Honorable Laura T. Swain  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

**MEMO ENDORSED**

Re: Collymore v. City of New York, et al.  
Docket No. 16 CV 8270 (LTS) (OTW)

Dear Judge Swain:

I am an Assistant Corporation Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, attorney for Defendants in the above-referenced action. Defendants write on behalf of all parties in support of a joint application to request a second extension of Defendants' time to move for summary judgment from January 24, 2022 to February 14, 2022, with Plaintiff's response due on May 3, 2022, and Defendants' Reply due May 24, 2022.

Defendants require this additional time to manage a number of deadlines, including, but not limited to, three mediations, two depositions, and the drafting of another dispositive motion, as well as submitting this summary judgment motion, in advance of my upcoming childcare leave, which is currently estimated to commence at the end of February. Plaintiff's counsel has requested the date for her opposition based on: previously scheduled medical appointments; an upcoming trial; and other professional commitments in March and April.

This is the second request for such relief. See ECF Dkt. No. 205. We observe the final pre-trial conference is set for April 8, 2022, and request an adjournment of the conference to allow for the conclusion of motion practice.

We thank you for your attention to this matter.

Respectfully submitted,

*/s/ Nicholas Schaefer*

Nicholas Schaefer

Senior Counsel

cc: Special Hagan (via ECF)  
Attorney for Plaintiff

The requested extensions of the parties' summary judgment briefing deadlines are granted. The final pretrial conference currently scheduled for April 8, 2022, is adjourned to July 15, at 10:30 a.m. DE#206 resolved.

SO ORDERED.

Dated: January 25, 2022

/s/ Laura Taylor Swain, Chief U.S.D.J.